

I'm writing to support the proposed amendments of Parts 73 and 74 to Improve Low Power FM radio Service Technical Rules (MB Docket No. 19-193 and the Modernization of Media Regulation Initiative (MB Docket No. 17-105)

I will speak to the issue of allowing LPFM station to increase its maximum power from 100 watts to 250 watts effective radiated power. KOCF is located on the western edge of the southern Willamette Valley in Oregon. The valley is surrounded by mountains. Even atop an 80' tower at the Lane Fire Authority fire station the height above average terrain is negative 42 meters. We have areas within our primary coverage that are unserved. Increasing signal strength would improve this issue. We are the only radio service licensed in the rural community of Veneta. Our station has recently entered into a contract with the City of Veneta to begin efforts to improve our station signal. One of the provisions of this contract is to provide emergency communications access for the City. We also have a similar agreement with the local fire authority where our transmitter is housed. We have provided training and made technical arrangements for fire personnel to have access to the KOCF broadcast signal in the event of a local emergency. The Fire authority has 17 stations within its District. With slightly improved signal propagation our radio station could reach all 17 stations in the Fire District. Recently retired Fire Chief Terry Ney had expressed that to have all the stations capable of monitoring our signal would enhance emergency communications. Rural residents in those areas would be served by any emergency communication initiated by the Fire Authority.

I'm also supportive of the following issues;

- LPFM services should be able to utilize directional antennas.
- Channel 6 protections should be lifted for LPFM.
- Support LPFM minor relocations based on overlapping existing and proposed service contour overlap.
- Support the codification of FM boosters for LPFM.
- Co-located LPFM facilities, especially sharing the same channel, should be able to utilize a common EAS unit.
- § 73.807(a)(1) concerning LPFM protection of Second and Third Adjacent translators should be eliminated.
- § 73.870(c) should be eliminated, and harmonized with other services such as FM, AM, TV, and LPTV.
- "Type Accepted" and "Type Certified" transmitters should be able to be utilized by LPFM since the underlying specifications are the same.

LPFM stations across this country have created a locally originated radio source. In rural communities this is usually the only local source for information. In emergency situations these stations can save lives. Many of the station are volunteer operated and run on a very low budget. Any effort to allow the stations to operate at a lower cost I support. Any effort to allow the stations to improve its signal and have clearer communications to the residents relying on the service I support.

Dean Middleton

KOCF-LPFM, Station Manager